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7 Attorneys for Defendant
8 BRUCE SAIYAD

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10 UNITED STATES DISTRICT COURT
11
12 NORTHERN DISTRICT OF CALIFORNIA
13
14 SAN FRANCISCO DIVISION

15 UNITED STATES OF AMERICA,

16 Plaintiff,
17
18 vs.

19 BRUCE SAIYAD, ET AL.

20 Defendants.

21 Case No. CR-11-00572 SI

22
23 **AMENDED STIPULATION AND**
24 **[PROPOSED] ORDER TO CONTINUE**
25 **STATUS HEARING**

26
27 Defendant BRUCE SAIYAD, by and through his appointed counsel Michael Hinckley,
28 Luis Romero by and through his appointed counsel Edward Hu of the Federal Public Defenders
1 Office, Jesus Perez by and through his counsel George Boisseau, and the United States of
2 America, by and through Assistant United States Attorney Matthew McCarthy, hereby stipulate
3 and agree to continue this matter from December 7, 2012 to January 25, 2013 at 11:00 a.m.

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5 Good cause exists for this request in that Mr. Hinckley needs additional time to complete
6 his discovery review, investigation, and plea discussions due to the recent appointment of his law
7 partner Lidia Stiglich to the Nevada bench. As a result of this good fortune for Judge Stiglich,
8 Mr. Hinckley's caseload and firm administrative responsibilities have doubled overnight
9 necessitating this request. Additionally, counsel for defendants Perez and Romero request
10 additional time to complete review of discovery relevant to a potential plea and/or trial prior to
11 proceeding.

The parties also stipulate and agree that excluding the time resulting from this continuance from computation under the Speedy Trial Act is appropriate for continuity of counsel, effective case preparation, in the interest of justice and outweighs the best interest of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

12/4/2012 /s/Matthew McCarthy
Dated: _____ Matthew McCarthy

Assistant United States Attorney

12/4/2012 /s/Michael Hinckley
Dated: _____
MICHAEL HINCKLEY
Attorneys for Defendant
Bruce Saiyad

12/4/2012 /s/Edward Hu
Dated: _____
EDWARD HU
Attorneys for Defendant
Luis Romero

12/4/2012 /s/George Boisseau
Dated: _____

George Boisseau
Attorneys for Defendant
Jesus Perez

ORDER

GOOD CAUSE APPEARING, upon stipulation of the parties, this matter is continued from December 7, 2012 to January 25, 2013 at 11:00 a.m. for status.

Also, based upon the representation of counsel and the stipulation, and good cause shown, the Court finds that failure to exclude time from December 7, 2012 to January 25, 2013, would unreasonably deny defendant reasonable time necessary for effective preparation of his counsel, taking into account the exercise of due diligence as well as to insure continuity of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court finds that the ends of justice served by excluding time from December 7, 2012 to January 25, 2013, from computation under the Speedy Trial act outweigh the best interest of the public and the defendant in a speedy trial.

THEREFORE, IT IS HEREBY ORDERED that the time from December 7, 2012 to January 25, 2013, shall be excluded from computation under the Speedy Trial act. 18 U.S.C. § 3161 (h)(7)(A) &(B)(iv).

IT IS SO ORDERED.

Dated: 12/06/2012

